

## REMARKS

Entry of this Amendment and reconsideration are respectfully requested in view of the amendments made to the claims and for the remarks made herein.

Claim 1-24 are pending and stand rejected. Claims 1, 11, 17 and 22 have been amended.

Claims 1-7, 9, 11-13, 15, 17, 19 and 21 stand rejected under 35 USC 103(a) as being unpatentable over Horii (USP no. 6,460,056) and Takagi (USP no. 4,568,979).

Applicant respectfully disagrees with and explicitly traverses the reason for rejecting the claims. However, in the interest of advancing the prosecution of this matter, the independent claims 1, 11, 17 and 22 have been amended to recite that the animated signal is determined from the animation parameters, which impart movement to the animated model. No new matter has been added. Support for the amendment may be found on page 9, lines 9-11 of the written description, which state "[o]nce the signal language symbols corresponding to the words in the speech signal are identified, the resulting signal contains animation model parameters which are used by an animation rendering block to manipulate or animate or otherwise impart movement to the features of a character."

Horii discloses a system for providing an image display corresponding to document data or speech data wherein the image data (such as sign language images) are stored in an image dictionary in motion picture form. Document data is read out from a character information storage device and a sign language image corresponding to a character string of the document data is selected from the image dictionary and displayed on a display." (see Abstract).

Horii teaches, and the instant Office Action refers to, that sign language image data corresponding to the character information is read from a storage device. Horii teaches that "[t]he sign language images may be obtained for example by adding motion to images produced by computer graphics or actually photographing persons." (see col. 3, lines 14-16).

However, contrary to the statements made in the Office Action, Horii fails to disclose generating animation parameters from a mapping of the speech components to a sign language model and generating a signal from the parameters where the parameters

impart movement to the model, as is recited in the claims. Rather Horii teaches that the sign language image is read from the data base.

With reference to Horii teaching that the sign language images may be obtained by adding motion to images produced by computer graphics, applicant submits that Horii is teaching that the entries in the data base are generated by computer graphics and that the entries are different by adding motion to the computer generated image. Hence, rather than teaching generating images from a signal which is animated by animation parameters, Horii teaches predetermined and pre-stored images corresponding to the speech inputs.

Takagi teaches a television receiving system that can be used to generate a picture and sound from a broadcast video signal or to generate just a picture from a locally produced video signal. Takagi is cited to show that separation of video and speed signals is known in the art.

A claimed invention is *prima facie* obvious when three basic criteria are met. First, there must be some suggestion or motivation, either in the reference themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine the teachings therein. Second, there must be a reasonable expectation of success. And, third, the prior art reference or combined references must teach or suggest all the claim limitations.

With reference to claim 1, neither the Horii nor Takagi, individually nor in combination, teach or suggest all the elements recited in the above referred-to claims. More specifically, neither reference teaches "generating an animation signal from said animation model parameters by using a processor connected to the monitor, said parameters imparting movement to said animation model", as is recited in the claims. Hence, even if there were some motivation to combine the teachings of the cited reference, which applicant believes does not exist, the combined device would fail to teach all the features recited in independent claim 1.

Accordingly, the subject matter recited in claim 1 is not rendered obvious by the teachings of the cited references, as the combined device fails to recite all the elements claimed in independent claim 1.

Applicant submits the reason for the rejection has been overcome and respectfully requests withdrawal of the rejection and allowance of the claim.

With regard to remaining independent claims, these claims recite subject matter similar to that stated in claim 1 and were rejected citing the same references used in rejecting claim 1. Thus, applicant's remarks made in response to the rejection of claim 1 are also applicable in response to the rejection of these claims. Applicant submits that in view of the amendments made to the claims and for the remarks made with regard to the rejection of claim 1, which are reasserted, as if in full, in response to the rejection of the remaining independent claims, the reason for the rejection of these claims has been overcome and the rejection can no longer be sustained. Applicant respectfully requests withdrawal of the rejection and allowance of the claims.

The other claims in this application are each dependent from the independent claim discussed above and are therefore believed patentable for the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual consideration of the patentability of each on its own merits is respectfully requested.

For all the foregoing reasons, it is respectfully submitted that all the present claims are patentable in view of the cited references. A Notice of Allowance is respectfully requested.

Respectfully submitted,

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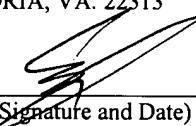
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